

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-cr-20051-JEM

**UNITED STATES OF AMERICA**

**Plaintiff,**

**vs.**

**ALFRED LENORIS DAVIS,**

**Defendant.**

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**DEFENDANT’S NOTICE OF EXPERT TESTIMONY**

The Defendant, Alfred Lenoris Davis, by and through undersigned counsel, respectfully notifies the Court that he may call to testify at trial Thomas Pullen, an expert in computer forensic analysis.

**Name of Witness:** Thomas Pullen, J.D., M.C.P.

**Training/Qualifications/ Experience:** Mr. Pullen’s is a state and federal court certified computer forensic analyst. His *curriculum vitae* (CV) showing his qualifications is attached.

**Summary of Testimony:** Based on training, experience, and knowledge, Thomas Pullen will testify in the areas of IP addresses and his analysis of the materials provided by the Government in the discovery from the computer forensics viewpoint, including various subpoenaed records to Comcast, AT&T, Google, TD Bank, Navy Credit union, Breezeline, etc.

In this Notice, Mr. Davis has provided disclosures about Mr. Pullen’s background, experience, and anticipated areas of testimony. Under Fed. R. Crim. P. 16(b)(1)(C)(i), Defendant is not required to “give the Government a written summary of any testimony that the defendant intends to use under Fed. R. Evid. 702, 703, or 705” because he did not request Government “disclosures under subdivision (a)(1)(G)” of Fed. R. Crim. P. 16.

### **Approval of Disclosure**

Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C)(v), I have reviewed this disclosure and approve of its contents.

/s/ Thomas Pullen

Thomas Pullen  
Computer Forensic Analyst

### **CERTIFICATE OF SERVICE**

I HEREBY certify that on April 23, 2024, undersigned counsel electronically filed foregoing document with the Clerk of Courts using CM/ECF which will send notification of such filing to all counsel of record.

Respectfully submitted,

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